

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERNIE HINES D/B/A COLORFUL MUSIC,

Plaintiff,

v.

ROC-A-FELLA RECORDS INC, DEF JAM
RECORDINGS INC., UNIVERSAL MUSIC
GROUP, SONY MUSIC HOLDINGS INC.,
SHAWN CARTER p/k/a JAY-Z and
TIMOTHY MOSLEY p/k/a TIMBALAND,

Defendants.

CASE NO. 19-CV-04587-JPO

DECLARATION OF CHRISTINE LEPERA

I, Christine Lepera, hereby declare as follows:

1. I am a partner, through my professional corporation, in the law firm Mitchell Silberberg & Knupp LLP, counsel of record for Defendants Roc-A-Fella Records, LLC (sued incorrectly as Roc-A-Fella Records Inc.) and Def Jam Recordings, a division of UMG Recordings, Inc. (sued incorrectly as Def Jam Recordings Inc. and Universal Music Group) (collectively, “Moving Defendants”). I am admitted to practice before this Court.

2. I respectfully submit this declaration in support of Moving Defendants’ Motion to Dismiss. Unless otherwise stated, I have personal knowledge of the following facts and if called and sworn as a witness I could and would competently testify thereto.

3. Attached hereto as **Exhibit A** is a true and correct copy of a photograph of the sheet music for the musical composition “Help Me Put Out The Flame (In My Heart)” (“Help Me”) that, upon information and belief, Hines deposited with the United States Copyright Office to obtain the attached copyright registration of “Help Me” (the “Help Me Deposit Copy”), and

which was provided to and maintained in the files of the Library of Congress. My firm obtained the Help Me Deposit Copy from those files on or about May 16, 2019 and I provided it to Plaintiff's counsel, Christopher Brown, on May 23, 2019.

4. Attached hereto as **Exhibit B** is a true and correct copy of the copyright registration for "Help Me," dated December 23, 1969 and bearing Registration No. EU154302. My firm obtained this document from the Copyright Office on or about May 2, 2019 and I provided it to Plaintiff's counsel, along with the Help Me Deposit Copy, on May 23, 2019.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of August, 2019 at New York, New York.

/s/ Christine Lepera
Christine Lepera